

Federal Defenders  
OF NEW YORK, INC.

Southern District  
52 Duane Street, 10th Floor  
New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara Giwa  
Executive Director

Jennifer L. Brown  
Attorney-in-Charge

**MEMO ENDORSED**

February 5, 2025

Application GRANTED. Jones Law Firm is hereby authorize to act as escrow agent for Heritage Integrity Investment Trust.

**BY ECF**

The Honorable Jessica G.L. Clarke  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

SO ORDERED.



JESSICA G. L. CLARKE  
United States District Judge

**Re: United States v. Isaac Briggs, III**  
**23-CR-0644 (JGCL)**

Dated: February 6, 2025  
New York, New York

Dear Judge Clarke:

Isaac Briggs, III, through undersigned counsel, respectfully asks the Court to enter an order modifying the conditions of his pretrial release. Specifically, he asks the Court for permission to authorize the Jones Law Firm to act as escrow agent for Heritage Integrity Investment Trust (hereinafter, "Heritage") in order to (1) collect debts owed to Heritage; and (2) take further action, as needed, to liquidated Heritage's assets (i.e., to set up a brokerage account for Heritage and sell Notes at current market). Currently, however, Mr. Briggs' release conditions require him to cease all work in Heritage, and further prohibits him from opening any investment accounts.

Undersigned counsel has conferred with the government about this request. The government takes no position on the request.

It is also undersigned counsel's understanding that the civil attorney representing at least one of the victims in this criminal case has no objection to the Jones Law Firm acting as escrow agent for Heritage.

The Jones Law Firm has represented that, when acting as escrow agent, to the extent that it is able to collect funds for Heritage, it would use those funds, first draw, to pay off all acknowledged creditors of Heritage; and second draw, it would retain in escrow, sufficient funds to satisfy any claims against Heritage that are still in dispute. All creditors and disputed claimants would be funded before any distribution would be made to Mr. Briggs.

Granting the requested modification would thus be the first step in placing Mr. Briggs in a position to satisfy his restitution and criminal forfeiture obligations, which he is eager to do. Accordingly, Mr. Briggs asks the Court to grant the requested modification.

Respectfully Submitted,

/s/

Kristoff I. Williams

Assistant Federal Defender

Federal Defenders of New York

(212) 417-8791